

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
WESTERN DIVISION**

**CORR WIRELESS
COMMUNICATIONS, L.L.C.,
CELLULAR SOUTH, INC., and
CELLULAR SOUTH LICENSES, LLC**

PLAINTIFFS

V.

CIVIL ACTION NO. 3:12CV036

**AT&T, INC., AT&T MOBILITY LLC,
MOTOROLA SOLUTIONS, INC.,
QUALCOMM INCORPORATED, and
JOHN DOES 1-10**

DEFENDANTS

MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendant Qualcomm Incorporated, by and through counsel, moves the Court for an extension of time to respond to the Complaint, and requests an extension or enlargement of time of thirty days, until and including May 23, 2012.

1. The Complaint was filed on April 2, 2012, and served that same day on Qualcomm's registered agent for service of process.

2. Qualcomm has only recently retained local counsel and is attempting to inform counsel and provide them with information and documents regarding the underlying facts of this case.

2. Consequently, counsel for Qualcomm requested an additional thirty days from counsel for Plaintiffs to respond to the 142 paged Complaint. Plaintiffs refused, offering only an extension of time until May 16, 2012.

3. Qualcomm has a duty under the Federal Rules to respond to every allegation of the complaint, an obligation that can only be satisfied after a massive fact-gathering effort

relating to complex technologies, business issues, events in the 3GPP standards setting process and events in the FCC rulemaking process, among other matters. Preparing a response to the 142-page, 432-paragraph complaint is a very large undertaking. It will require determining the truth or falsity of a *vast* volume of detailed allegations after gathering knowledge spread across many individuals and multiple companies.

4. Qualcomm states unto the Court that granting this Motion would create no undue hardship, burden or prejudice to the Plaintiffs, and that this Motion for Extension of Time is not filed for purposes of delay or harassment.

5. For the foregoing reasons, Qualcomm moves this Court for an extension of time of thirty days to respond to the Complaint, allowing it until and including May 23, 2012, in which to file its response. Qualcomm further refers the Court to its Response and Memorandum Brief in Opposition to Plaintiffs' Motion for Expedited Scheduling and Case Management Conference and In Support of Qualcomm's Motion for Extension of Time to Respond to Complaint, which addresses issues related to the current motion.

Dated, this the 16th day of April, 2012.

QUALCOMM INCORPORATED, Defendant

By: /s/Margaret Sams Gratz
L. F. SAMS, JR. (MSB #6426)
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CERTIFICATE OF SERVICE

I, Margaret Sams Gratz, one of the attorneys for Defendant, Qualcomm Incorporated, hereby certify that I have electronically filed the foregoing Motion for Extension of Time to Respond to Complaint with the Clerk of the Court using the ECF system, which sent notification of such filing to the following:

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and I hereby certify that I have mailed by United States Postal Service the document to the following non-ECF participant:

Attorney for Defendant Motorola Solutions, Inc.

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This the 16th day of April, 2012.

/s/Margaret Sams Gratz
Margaret Sams Gratz